

**ADDENDUM TO THE FACT SHEET  
FOR NATIONAL POLLUTANT DISCHARGE  
ELIMINATION SYSTEM (NPDES)  
PERMIT NO. WA-002233-1**

**I. GENERAL INFORMATION**

**CITY OF ROSLYN  
PO BOX 451  
ROSLYN, WA 98941**

**II. APPLICATION REVIEW**

An application for permit reissuance was submitted to the Department of Ecology (Department) on December June 21, 2005 and accepted by the Department on June 22, 2005. Prior to making a determination whether to reauthorize an existing permit or conduct a full renewal, a thorough review of the permit and compliance history of the facility is conducted. This review shall be sufficiently detailed as to insure the following:

- That the permittee is in substantial compliance with all of the terms, conditions, requirements and schedules of compliance of the expired permit;
- That the Department has up-to date information on the Permittee's waste treatment practices; nature, content, and frequencies of Permittee's discharge; either pursuant to the submission of new forms and applications or pursuant to monitoring records and reports resubmitted to the Department by the permittee; and
- That the discharge is consistent with applicable effluent standards and limitations, water quality standards, and other legally applicable requirements listed in WAC 173-220-130.
- Or as in this case, is in the process of rectifying the source of the compliance problems by connecting their wastewater flow to the Regional Wastewater Treatment Plant.

The application for the City of Roslyn POTW and discharge monitoring reports (DMRs) were reviewed and they indicate no change in the treatment characteristics of the effluent process or increases in volume of wastewater have occurred.

### **III. PERMIT REAUTHORIZATION**

The permit reauthorization process, in concert with the routine renewal of high priority permits, allows the Department to reissue permits in a timely manner and minimize the number of active permits that have passed expiration dates. A system of ranking the relative significance of the environmental benefit to be gained by renewing a permit rather than reauthorizing a permit is followed during the Department's annual permit planning process. Each permit that is due for reissuance is assessed and compared with other permits that are also due for reissuance. The public is notified and input is sought after the initial draft ranking has tentatively established which permits are likely to be completely renewed and which are likely to be reauthorized. All relevant comments and suggestions are considered before a final decision is made regarding the type of reissuance for each permit.

This fact sheet addendum accompanies the draft permit, which is to be reauthorized to the City of Roslyn POTW for the discharge of wastewater to Crystal Creek. The existing fact sheet is also part of this administrative record and explains the basis for the discharge limitations and conditions of the reauthorized permit.

There are no existing or proposed industrial users of the POTW.

The existing permit requirements, including discharge limitations and monitoring, do not need to be changed to protect the receiving water quality. The existing fact sheet adequately addressed conditions and issues at the facility at the time when the existing permit was issued. The Department has not received any information during the course of the previous permit term indicating environmental impacts from the discharge were overlooked. Nor have incidents severe enough to undertake a complete renewal of the permit occurred during that time period.

The discharge limits and conditions in effect at the time of expiration of the previous permit are carried over unchanged to this reauthorized permit. Assessment of compliance and inspections of the facility during the existing permit term indicate that the facility should not be placed on a high priority for permit renewal. The Department assigns a high priority for permit renewals in situations where water quality would materially benefit from a more stringent permit during the next five-year permit.

The Permittee has had compliance problems with the requirements of the permit. This is the primary reason the City has opted to divert its wastewater to the Regional Wastewater Treatment Plant. In the last three years the Permittee has received violations for exceedances of the average monthly and maximum daily limits for the following parameters: BOD (11), BOD percent removal (5), Fecal Coliform (5), Ammonia (8), pH (10) and Suspended Solids (10). Other violations over the course of the last three years involve submittals of incomplete DMRs total (21). The Permittee is required to comply

with final limitations by May of 2006 as part of the terms of the current permit. The Department may extend the date final limits apply, conditionally, through an administrative order to allow for completion of the connection with the Cle Elum interceptor.

The Permittee is in the process of diverting its wastewater flow to the Regional Wastewater Treatment Plant for treatment. At this time (August 2005), the City of Roslyn has selected Grey and Osborne as its engineering firm. The City expects to begin the construction bidding process in the next few months, with construction to commence in the spring of 2006. The City expects to complete the connection to Cle Elum's Second Street interceptor with be complete no less than 200 days following beginning of construction. Once the connection is complete the City of Roslyn will no longer be required to possess a wastewater discharge permit.

The City of Roslyn treatment works includes three 5 acre infiltration/evaporation lagoons. Two of these lagoons are clay lined and will be decommissioned within the proposed permit term. The City has a third, PVC lined lagoon, which the City may wish to use for dilute domestic waste and stormwater detention in order to meter the flow to the Cle Elum POTW. The Department may require groundwater monitoring through an administrative order or stormwater permit once the City decides to use the lined lagoon. In addition groundwater monitoring or a study may be required as part of the lagoon decommissioning process.

There are no changes necessary to the existing permit based on the data contained in following tables and the City's imminent connection to the Regional Wastewater Treatment Plant.

Table 1 contains a direct comparison of the effluent parameters reported this current permit term, January 2002 to July 2005, with the previous five year permit term (1997-2000).

**Table 1**  
**Recent Effluent Characterization Compared with the Past Effluent Characterization**

Parameter	Effluent data 1997 - 2000		Effluent data 2002 - 2005	
	Effluent Average Daily Discharge	Effluent Maximum Daily Discharge	Effluent Average Daily Discharge	Effluent Maximum Daily Discharge
Flow (MGD)	0.32	0.90	0.26	0.63
BOD <sub>5</sub> (mg/L)	9.1	23.5	15.1	33.6
BOD <sub>5</sub> (% Removal)	87.9 <sup>1</sup>	99.4 <sup>1</sup>	82.4	98.9
TSS (mg/L)	9.5	53.9	24.4	76.6
Fecal Coliform (# per 100 mL)	6.5	96	10.7	130
Total Residual Chlorine (mg/L)	0.1	0.3	0.2	0.3
Ammonia Nitrogen (mg of N/L)	4.1	8.6	4.7	21.5
Temperature, summer (F°/C°)	64°/18°	65°/18°	ND*	ND
Temperature, winter (F°/C°)	38°/03°	47°/08°	37°/2.8°	52°/11.1°
pH range	low pH = 7.4	high pH = 9.8	low pH = 7.1	high pH = 9.6

\* ND means No Discharge

Public notice of the availability of the draft reauthorized permit is required at least 30 days before the permit is issued [Washington Administrative Code (WAC) 173-220-050]. The fact sheet and draft permit are available for review (see Appendix A - Public Involvement for more detail on the Public Notice procedures).

After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file for the permit and parties submitting comments will receive a copy of the Department's response. Comments and the resultant changes to the permit will be summarized in the fact sheet addendum, Appendix B - Response to Comments.

**IV. RECOMMENDATION FOR PERMIT ISSUANCE**

The Department proposes that this permit be reauthorized for five years.

## **APPENDIX A -- PUBLIC INVOLVEMENT INFORMATION**

The Department has determined to reauthorize a discharge permit to the applicant listed on page 1 of this fact sheet addendum. The permit contains conditions and effluent limitations that are described in the fact sheet.

Public notice of application was published on June 21, 2005 in the Ellensburg Daily Record and the Yakima Herald Republic to inform the public that an application had been submitted and to invite comment on the reauthorization of this permit.

The Department will publish a Public Notice of Draft Reauthorization (PNOD) on October 6, 2005 in the Northern Kittitas County Tribune to inform the public that a draft reauthorization permit, fact sheet addendum, and fact sheet are available for review. Interested persons are invited to submit written comments regarding the draft permit. The draft permit, fact sheet, and related documents are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below.

Water Quality Permit Coordinator  
Department of Ecology  
Central Regional Office  
15 West Yakima Avenue, Suite 200  
Yakima, WA 98902

Any interested party may comment on the draft permit or request a public hearing on this draft permit within the 30-day comment period to the address above. The request for a hearing shall indicate the interest of the party and the reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-220-090). Public notice regarding any hearing will be circulated at least 30 days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing (WAC 173-220-100).

Comments should reference specific text followed by proposed modification or concern when possible. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from reauthorization of this permit.

The Department will consider all comments received within 30 days from the date of the PNOD indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone at (509) 457-7105, or by writing to the address listed above.

This Addendum to the fact sheet and the proposed permit were written by Richard Marcley.

## **APPENDIX B -- RESPONSE TO COMMENTS**

Comment from City of Roslyn – Joseph Peck

October 13, 2005 (received from Ecology on Oct. 17, 2005).

Dear Ms. Huwe:

Thank you for the opportunity to comment on the NPDES permit re-authorization. I understand that this is the existing permit re-authorized until Roslyn can connect to the new Regional plant. We do have a number of concerns:

- 1) This permit will require compliance with final effluent limitations after June 1, 2006. These limits are not achievable with our existing treatment system. Our connection to the regional system will not be completed by June 1, 2006. To avoid a compliance crisis, we ask that the interim limits be extended through September 30, 2006.

*Departmental Response:*

*Interim limits will be extended to November 30, 2006*

- 2) Also the requirement to remove all basement drains and pumps is impossible to achieve by May 31, 2006. In 2004 the City completed a sewer system I&I removal project that replaced sanitary sewers and removed storm drains that were identified in the June, 2003 Storm & Sanitary Sewer Comprehensive Inflow & Infiltration Report as major sources of I&I. Based on the reduced flows seen at the treatment plant in winter and spring, 2004-2005, it is evident that we removed a major source of I&I. The City will continue to monitor flows and remove basement drains and pumps as soon as we are able. Basement drain removal will require, in most cases, cutting a trench in the existing homes basements floor, wall and yard to install 2 new pipes, one for storm and one for sanitary sewer. Some areas of town have no storm option at the curb. Also our storm system I currently what is left of the original clay combo sewer constructed in the early 1900's and may cause basement flooding due to poor condition and because it is undersized.

All our resources will go towards construction of the interceptor line that will connect us to the regional system, and construction of the I&I attenuation facility and decommissioning the 2 five acre 1973 lagoons and disposal of the sludge.

For these reasons the City requests that ecology remove the basement drain and pump requirement, and the deadline of May 31, 2006 from our permit.

Thank you for your consideration.

*Departmental Response:*

*The Department recognizes the progress Roslyn has made in the reduction of I&I with the work completed to date. In the Best Professional Judgment of the Department, the removal of the basement drain and pump requirement is appropriate in light of the pending connection to the regional system. Furthermore S4 C., Infiltration and Inflow Evaluation Progress Report, keeps the City and the Regional Wastewater Facility current as to the extent and progress being made toward further I&I reductions that include the illegal basement hookups.*